REMARKS

This is in response to the Office Action mailed on <u>December 21, 2004</u>, and the references cited therewith.

No Claims are amended, canceled or added in this response; as a result, claims 1-18 remain pending in this application.

Interview Summary

Applicant thanks Examiner Kevin Bates for the courtesy of a telephone interview on September 12, 2005 with Applicant's representative Rodney Lacy. During the interview Applicant's representative confirmed that a response to the Office Action mailed December 21, 2004 had not been filed as of September 12, 2005.

§103 Rejection of the Claims

Claims 1-18 were rejected under 35 USC § 103(a) as being unpatentable over Dobbins (U.S. Patent No. 5,828,772) in view of Reichmeyer (U.S. Patent No. 6,286,038). In order for the Examiner to establish a *prima facie* case of obviousness, three base criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. *M.P.E.P.* § 2142 (citing *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed.Cir. 1991)). Applicant respectfully traverses the rejection because the claims contain elements not found in the cited references.

For example, claim 1 recites in part "automatically generating a routing configuration for the virtual router based on the site reachability data and the routing

profile." The Office Action asserts that Dobbins teaches the recited language at column 10, lines 42-46 and at column 13, lines 48-59. Applicant respectfully disagrees with this interpretation of Dobbins. Dobbins at column 10, lines 42-46 merely states that a VLAN mapping may be provided may an external application, either implicitly or explicitly. Dobbins at column 13, lines 48-59 states that the system uses an algorithm to set up a connection mapping. The VLAN mapping associates a VLAN identifier with an IP address. This is different from a routing configuration, where routing parameters control how network data is sent through a network. Nowhere in the cited sections or in Dobbins as a whole is it taught that a routing profile is used to generate a routing configuration. Additionally, Applicant has reviewed Reichmeyer and can find no teaching or disclosure of automatically generating a routing configuration. As a result, the combination of Dobbins and Reichmeyer fails to teach or suggest all of the elements of claim 1. Applicant respectfully requests reconsideration and the withdrawal of the rejection of claim 1.

Claims 2-14 depend either directly or indirectly from claim 1. These dependent claims are patentable over the combination of Dobbins and Reichmeyer for the reasons argued above, and are also patentable in view of the additional elements which they provide to the patentable combination. If an independent claim is nonobvious under 35 U.S.C. § 103, then any claim depending therefrom is also nonobvious. MPEP § 2143.03. Applicant respectfully requests reconsideration and the withdrawal of the rejection of claims 2-14.

With respect to claim 15, the Office Action asserts that Reichmeyer, at column 6, lines 31-42, teaches both "receiving a change in the routing policy" and "displaying a list of virtual routers in the set of virtual routers that were configured using the routing policy." Applicant respectfully disagrees with this interpretation of Reichmeyer. As an initial matter, Reichmeyer does not teach or suggest the use of a virtual router. Rather, Reichmeyer is directed to configuring a network device (see Abstract). Further, the cited section of Reichmeyer merely states that a network device identifies itself to a network server and receives a configuration file from the network server. Nowhere in the cited section of is a change in a routing policy mentioned. Further, nowhere in the cited section of Reichmeyer, or in Reichmeyer as a whole, is

it taught or suggested that a list of virtual routers that were configured using a particular routing policy is displayed. The Office Action correctly states that Dobbins does not teach the recited language. In view of the above, the combination of Dobbins and Reichmeyer fails to teach or suggest each and every element of Applicant's claim 15.

Claim 15 also recites "receiving a selection of the subset of virtual routers in the set of virtual routers." The Office Action correctly states that Dobbins does not teach the recited language. However, the Office Action states that Reichmeyer, at column 5, lines 26-34 teaches the recited language. Applicant respectfully disagrees with this interpretation of Reichmeyer. The cited section states that network entities may "auto configure" based on information in a topological database. Nothing is disclosed about virtual routers or receiving a selection of virtual routers from a list of virtual routers displayed to a user. Thus neither Dobbins nor Reichmeyer teach or suggest receiving a selection of the subset of virtual routers in the set of virtual routers.

In view of the above, the combination of Dobbins and Reichmeyer fails to teach or suggest each and every element of Applicant's claim 15. As a result, claim 15 is nonobvious and allowable with respect to the combination of Dobbins and Reichmeyer. Applicant respectfully requests reconsideration and the withdrawal of the rejection of claim 15.

Claims 16-18 depend either directly or indirectly from claim 15. These dependent claims are patentable over the combination of Dobbins and Reichmeyer for the reasons argued above, and are also patentable in view of the additional elements which they provide to the patentable combination. If an independent claim is nonobvious under 35 U.S.C. § 103, then any claim depending therefrom is also nonobvious. MPEP § 2143.03. Applicant respectfully requests reconsideration and the withdrawal of the rejection of claims 16-18.

CONCLUSION

Applicant respectfully submits that the claims are in condition for allowance, and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney at (612) 373-6954 to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

Respectfully submitted,

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Date ___February 2, 2006___   By ___/Rodney L. Lacy/_____
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This paper or fee is being filed on the date indicated above, using the USPTO's electronic filing system EFS-Web, and is addressed to the Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.